



May 28, 2026

The Honorable Mehmet Oz
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: Medicaid Program; 2028 Medicaid Home and Community-Based Services Quality Measure Set (CMS-2453-NC)

Dear Administrator Oz:

On behalf of Argentum, the leading national association representing senior living communities and the older adults and families they serve, we appreciate the opportunity to submit comments on the Centers for Medicare & Medicaid Services' (CMS) notice entitled "[Medicaid Program; 2028 Medicaid Home and Community-Based Services Quality Measure Set.](#)"

Argentum is a leading national association dedicated to supporting professionally managed, resident-centered senior living communities and the older adults and families they serve. Our members operate the majority of professionally managed senior living communities nationwide, serving more than one million older adults in assisted living and memory care settings, including a significant proportion who receive Medicaid-funded services through Home and Community-Based Services (HCBS) programs.

Argentum supports CMS's goal of advancing high-quality, person-centered care in Medicaid HCBS programs. We recognize the importance of standardized quality measurement to improve transparency, support accountability, and drive better outcomes for beneficiaries. At the same time, we urge CMS to ensure that the final measure set is implemented in a manner that promotes flexibility, minimizes administrative burden, preserves access to assisted living and other residential-based HCBS for Medicaid beneficiaries nationwide, and reflects the operational realities of providers serving Medicaid beneficiaries.

I. Importance of Flexibility and Feasibility in Measure Implementation

Argentum appreciates efforts to promote consistency across states through a standardized framework. However, HCBS programs vary significantly in structure, populations served, delivery systems, and data collection capabilities. As such, it is critical that CMS preserve flexibility for states in determining how best to implement the measure set, including required reporting on mandatory measures, optional reporting on voluntary measures, and specified timelines and methodologies for data collection and reporting.

States will be required to report on these measures on a biennial basis beginning in 2028, under the broader Medicaid Access Rule framework. This represents a significant new requirement that will require investments in data infrastructure, survey tools, and administrative processes. Without adequate flexibility, states and their provider partners may face challenges in operationalizing these requirements effectively.

Recommendation: CMS should allow states broad flexibility in selecting appropriate data sources, survey instruments, and implementation approaches, particularly for experience-of-care and outcome-based measures.

II. Administrative Burden and Risk to Access

While the HCBS Quality Measure Set is reported at the state level, its implementation will rely on data collection and processes involving providers across the HCBS continuum. Senior living communities and other HCBS providers face administrative pressures, and the addition of new requirements by states, including new data collection or participation in standardized surveys, may exacerbate these challenges.

Although the proposed measures are intended to be collected primarily through administrative data and recipient surveys, their downstream operational impact on providers is likely to vary depending on how states implement them. Argentum is concerned that, without careful implementation, the cumulative burden of these requirements could discourage provider participation in Medicaid HCBS programs, ultimately limiting access to services for beneficiaries.

Recommendation: CMS should explicitly consider administrative burdens in finalizing the measure set and provide guidance to states encouraging streamlined data collection, alignment with existing reporting systems, and avoidance of duplicative requirements.

III. Measure Selection and Applicability Across Diverse HCBS Settings

The proposed HCBS Quality Measure Set includes measures spanning multiple domains, including experience of care, person-centered planning, safety, and community integration. We support CMS's focus on person-centered outcomes and quality of life measures. However, not all measures may be equally applicable across the full range of HCBS settings, particularly residential settings such as assisted living communities.

HCBS encompasses a wide array of services delivered in different environments—from in-home personal care to congregate residential settings. Measures that are appropriate for one setting may not accurately reflect quality or performance in another. Without appropriate adjustment or flexibility, standardized measures may produce misleading results or fail to capture the full scope of services provided.

Recommendation: CMS should ensure that measures are appropriately tailored or adaptable across different HCBS settings and populations, and should allow states to account for these differences in their reporting approaches.

IV. Stratification Requirements and Data Reliability

The proposal includes requirements for states to report stratified data for certain measures, including by factors such as rural versus urban status and other demographic characteristics. Argentum supports efforts to improve transparency and address disparities in HCBS programs. However, stratification requirements introduce additional data collection and reporting complexity. In some cases, states and providers may not currently collect all required data elements, or may face challenges ensuring data accuracy and completeness.

Phased implementation and clear guidance will be essential to ensure that stratified reporting produces meaningful and reliable insights, rather than increasing administrative burden without commensurate benefit.



Recommendation: CMS should phase in stratification requirements, provide technical assistance to states, and ensure that required data elements are feasible to collect across HCBS programs.

V. Alignment with Existing Quality Initiatives and Infrastructure

HCBS providers and state Medicaid programs are already engaged in a range of quality improvement and reporting initiatives. Introducing a new, standardized measure set presents an opportunity to align and streamline these efforts—but also a risk of duplication if not implemented carefully. We encourage CMS to ensure that the HCBS Quality Measure Set aligns with existing federal and state quality initiatives, as well as commonly used measurement tools and surveys.

Recommendation: CMS should prioritize alignment with existing measures and reporting systems and seek to minimize duplication and fragmentation across quality initiatives.

VI. Need for Investment and Technical Assistance

Successful implementation of the HCBS Quality Measure Set will require significant investments in data systems, workforce training, and operational processes at both the state and provider levels. Without sufficient resources and technical assistance, states and providers may struggle to meet reporting requirements, potentially affecting data quality and program participation.

Recommendation: CMS should provide robust technical assistance, clear guidance, and resources to support implementation, particularly for states and providers with limited existing infrastructure.

Conclusion

Argentum supports CMS's goal of advancing high-quality, person-centered care in Medicaid HCBS programs and appreciates the agency's efforts to establish a standardized quality measure set. At the same time, it is essential that the final measure set be implemented in a manner that is flexible, feasible, and aligned with the realities of HCBS delivery systems. Policies that increase administrative burden or fail to account for provider capacity risk undermining access to care for Medicaid beneficiaries.

We look forward to working with CMS and other stakeholders to ensure that the HCBS Quality Measure Set achieves its intended goals while supporting continued access to high-quality HCBS, including in assisted living and other residential settings.

Thank you for your consideration.

Sincerely,

James Balda
President & CEO
Argentum